



March 27, 2025

**Via ECF**

Hon. Nina R. Morrison  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Jones v. NIKE Retail Services, Inc.  
No. 22 Civ. 3343 (NRM) (ARL)**

Dear Judge Morrison:

Plaintiff writes together with Defendant to seek additional time to complete discovery so the Parties may engage in a private mediation with Stephen Sonnenberg of JAMS.

By way of background, on March 14, Your Honor advised the Parties that if the Parties wanted to mediate and believe it would be fruitful, the Court would entertain a brief discovery extension, so long as the Parties promptly selected and scheduled a mediation. *See* ECF No. 49, Tr. 9:22-10:8. To these ends, the Parties immediately identified experienced neutrals that have mediated late-payment cases in the retail industry. While still taking depositions, exchanging discovery, and working to resolve discovery disputes, the Parties conferred on mediation and sought availability from several mediators. Upon review of their schedules, the Parties agreed to a virtual mediation with Mr. Sonnenberg on May 21, 2025, as it was the earliest date on which the Parties and the mediators we reached out to were available.

As a result, in accordance with the Court's direction on March 14, the Parties write to propose the following mediation and discovery schedule:

Deadline	Current Date	Proposed Date
Mediation	n/a	May 21, 2025
Mediation Status Report	n/a	May 28, 2025
Completion of All Discovery	April 17, 2025	June 20, 2025
Service of Class Certification Motion	April 28, 2025	June 30, 2025
Defendant's Opposition	35 days after service of Motion	Same

Hon. Nina. R. Morrison, U.S.D.J.  
Re: *Jones v. NIKE Retail Services, Inc.*  
March 27, 2025  
Page 2 of 2



Plaintiff's Reply	14 days after service of Opposition	Same
First Step in Dispositive Motion Practice	April 30, 2025	August 4, 2025
Joint Pretrial Order	June 2, 2025	August 29, 2025
Final Conference Before Hon. Arlene R. Lindsay, U.S.M.J.	June 5, 2025	After Sept. 2, 2025, at a date and time to be determined by Judge Lindsay

We thank the Court for its attention to this matter.

Respectfully submitted,



Garrett Kaske

cc: Counsel of Record (via ECF)